

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

NO. 15-CR-4268-JB

ANGEL DELEON, et al.,

Defendants.

**UNOPPOSED MOTION TO CONTINUE DEFENDANTS' DEADLINE TO FILE  
FEDERAL RULE OF CRIMINAL PROCURE 12 MOTIONS**

Defendants Christopher Garcia, by and through CJA counsel Amy Sirignano, of the Law Office of Amy Sirignano, PC, and Christopher W. Adams, of the Law Office of Christopher W. Adams, PC, and Joe Lawrence Gallegos, through co-counsel Brock Benjamin, and Rick Sindel, and Edward Troup, through co-counsel, Cori Harbour-Valdez, and Pat Burke, and Billy Garcia, through co-counsel Robert Cooper, and Jim Castle, and Allen Patterson, through counsel Jeff Lahann, and Christopher Chavez, through co-counsel Orlando Mondragon, and John Granberg, and Arturo Arnulfo Garcia, through co-counsel Billy Blackburn, and Scott Davidson, and Mario Rodriguez, through co-counsel Santiago Hernandez, and Steven Potolsky, and Mauricio Varela, through co-counsel Mary Stillinger, and Joe Spencer, and Daniel Sanchez, through co-counsel Richard Jewkes, and Amy Jacks, and Conrad Villegas, through counsel B.J. Crow, and Anthony Ray Baca, through co-counsel Marc Lowry, and Theresa Duncan, and Carlos Herrera, through co-counsel Michael Davis, and Carey Bhalla, and Rudy Perez, through co-counsel Ryan Villa, and Justine Fox-Young, and Andrew Gallegos, through counsel Donavon Roberts, and Shauna Gutierrez, through counsel Angela Arellanes, respectfully request the Court grant this

Unopposed Motion to Continue the defendants' Rule 12 motion deadline (Doc. 1205), and states the following:

1. Counsel for Mr. Garcia emailed all AUSAs October 6, 2017, requesting their position for a one week extension for filing Rule 12 motions.
2. On October 6, 2017, AUSA Maria Armijo agreed to Mr. Garcia's request for a one-week extension for filing Rule 12 motions.
3. Counsel for Anthony Ray Baca also contacted Ms. Armijo on October 6, 2017, to request her position on extending the Rule 12 deadline with respect to all defendants in case 15-CR-4268.
4. Ms. Armijo agreed to Mr. Baca's request to give the defendants a one-week extension on the Rule 12 deadline on the condition that the defendants agree not to oppose any similar request the government may make in responding to the motions. The defendants who have joined in this motion have all agreed to this condition.
5. Accordingly, counsel for Defendants respectfully request a short extension of the Rule 12 filing deadline from today, Friday, October 6, 2017, to Friday, October 13, 2017.

For the foregoing reasons, Defendants respectfully requests that the Court enter an Order Continuing the October 6, 2017, deadline to file Fed. R. Crim. P. 12 Motions.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was sent via the Court's CM/ECF system to opposing counsel, AUSAs Maria Armijo, Randy Castellano, and Matthew Beck, this 6th day of October 2017.

\_\_\_\_\_/s\_\_\_\_\_  
Amy Sirignano, Esq.